

IN THE UNITED STATES DISTRICT COURT FOR THE

WESTERN DISTRICT OF OKLAHOMA

FILED

JUL - 2 2007

ROBERT D. DENNIS
U.S. DIST. COURT, WESTERN DIST. OF OKLA.
BY *[Signature]* DEPUTY

UNITED STATES OF AMERICA,)

Plaintiff,)

-vs-

) CR-07-156 F

No.

BRENDA SUE MYERS,)

a/k/a BRENDA SUE BARNETT,)

Violation: 18 USC § 1001(a)(3)

Defendant.)

INFORMATION

The United States Attorney charges:

1. The Department of Labor is charged with administering the provisions of the Labor-Management Reporting and Disclosure Act (LMRDA) of 1959. The Act established standards for labor union democracy and financial integrity and requires reporting and public disclosure of union reports.

2. Labor Organizations that fall under the LMRDA are required to file annual financial reports with the Office of Labor Management Standards, a department within the Department of Labor. The Union's officers, including the president and secretary-treasurer, are responsible for the accuracy of the reports.

3. One such report is the LM-3, a four-page financial report, which is filed by a labor union and discloses basic financial information including assets, liabilities, receipts and disbursements. The LM-3 also requires detailed disclosure of disbursements to officers.

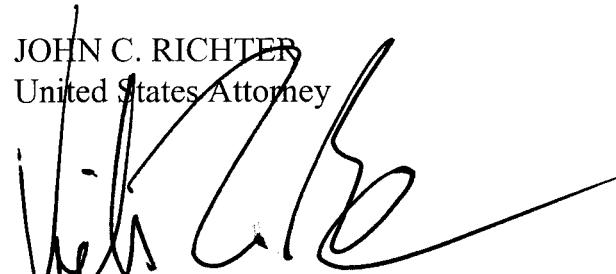
4. **BRENDA SUE MYERS** was the President of American Federation of Government Employees Local Union 2282 from approximately November 1, 2004 to September 6, 2006.

5. On or about August 23, 2006, in the Western District of Oklahoma,

----- **BRENDA SUE MYERS,**
a/k/a BRENDA SUE BARNETT, -----

the defendant herein, in a matter within the jurisdiction of the Department of Labor, an agency of the United States, did knowingly and willfully make and use a material false writing and document, specifically Form LM-3 Labor Organization Annual Report for the American Federation of Government Employees Local Union 2282, filed for year 2005, wherein the defendant was falsely reported that the Union had disbursed loans in the amount of \$21,500.00, when in fact she knew that statement was materially false and that she had in fact taken the money for her own personal use.

All in violation of Title 18, United States Code, Section 1001(a)(3).

JOHN C. RICHTER
United States Attorney

WICKI ZEMP BEHENNA
Assistant U.S. Attorney